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For reasons stated in Trustee's Objection

Jul 02, 2021

Kathy A. SURRATT-STATES
United States Bankruptky Judge

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

)

LACRISIA MADISON

) CASE NO. 21-41270-659
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## MOTION TO REINSTATE CHAPTER 13 PROCEEDING

Comes now Debtor, by and through counsel, and for her Motion to Reinstate Chapter 13 Proceeding, states as follows:

- 1. Debtor filed this voluntary Chapter 13 Petition for Relief on April 7, 2021.
- 2. This case was dismissed on June 8, 2021, for Debtor's failure to upload pay advices to the Trustee.
  - 3. All required pay advices have now been uploaded to the Trustee's system.

WHEREFORE, Debtor requests this Court enter its Order setting aside its June  $8^{\rm th}$ , 2021 Order and Notice of Dismissal, reinstating Debtor's case and the automatic stays of 11 U.S.C. Section 362, reappointing Diana S. Daugherty as Trustee and for such other and further relief as this Court deems just and proper in the circumstances.

Respectfully Submitted,

Date: June 16, 2021

/s/Martin K. Lundkvist
Martin K. Lundkvist #47213M0
Lundkvist & Associates, LLC
317 N. 11<sup>TH</sup> Ste 403
St. Louis, MO 63101
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was sent via either first class mail, postage prepaid, or the Court's ECF system this June 8, 2021 to Diana S. Daugherty, Chapter 13 Trustee, P.O. Box 403908, St. Louis, MO 63143, all creditors and other parties in interest as indicated on the attached matrix of creditors.

/s/Martin K. Lundkvist
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Avis Renta A Car System, LLC 300 Centre Pointe Dr Virginia Beach, VA 23462-4415

BJC Healthcare PO Box 958410 Saint Louis, MO 63195-8410

Capital One Bank PO Box 6492 Carol Stream, IL 60197-6492

CCS PO Box 55126 Boston, MA 02205-5126

Children's Clinic of St. Louis 8888 Ladue Rd Ste 100 Saint Louis, MO 63124-2056 City of University City 6801 Delmar Blvd Saint Louis, MO 63130-3104

Complete Eye Care Inc. 9890 Clayton Rd Ste 200 Saint Louis, MO 63124-1685

Credit One Bank PO Box 60500 City of Industry, CA 91716-0500

CSM Foreclosure Trustee Corp. 701 Market St Saint Louis, MO 63101-1830

Direct Auto & Life Insurance PO Box 17905
Nashville, TN 37217-0905

Fifth Third Bank PO Box 630778 Cincinnati, OH 45263-0778

Firestone PO Box 81344 Credit First NA Cleveland, OH 44188-0001

Geico Insurance 1 Geico Ctr Macon, GA 31296

Metropolitan Sewer District PO Box 437 Saint Louis, MO 63166-0437

Millsap & Singer, P.C. 612 Spirit Dr Chesterfield, MO 63005-1259

Missouri Department Of Revenue PO Box 475 Attn. Bankruptcy Unit Jefferson City, MO 65102-0475 Mr Cooper PO Box 650783 Dallas, TX 75265-0783

Nationstar Mortgage, LLC PO Box 619033 Dallas, TX 75261-9033

One Advantage LLC 7650 Magna Dr Belleville, IL 62223-3366

Peritus Portfolio Services PO Box 141419 Irving, TX 75014-1419

Portfolio Recovery Associates PO Box 9001951 Louisville, KY 40290-1951

Quest Diagnostics PO Box 7306 Hollister, MO 65673-7306

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Saint Louis, MO 63130-2039

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